

FACT SHEET

Former E.I. Du Pont De Nemours & Company Facility
701 Dupont Drive
Cedar Mountain, North Carolina 27909-5006
EPA ID NUMBER: NCD 003152329

A Draft Class 3 Permit Modification (Modification) has been prepared for the Former E.I. DuPont De Nemours & Company (DuPont) Facility (Former DuPont Brevard Facility or Facility). The Modification is needed to incorporate a final remedy into the Resource Conservation and Recovery Act (RCRA) Corrective Action Permit for the Facility. Details of the final remedy are included in a Remedial Action Plan (RAP) submitted by DuPont. The RAP has been reviewed by the Hazardous Waste Section (HWS) and has been determined complete. Once fully implemented, the RAP will meet the requirements of N.C.G.S. Article 9 – Part 8 (Risk-Based Remediation) and 40 CFR 264.101 as adopted in 15A NCAC 13A .0109.

North Carolina has been authorized by the United States Environmental Protection Agency to administer RCRA including the Hazardous and Solid Waste Amendments (HSWA) of 1984. The State has determined that DuPont's proposed actions as described in the RAP satisfy the full intent of the North Carolina Hazardous Waste Management Rules and Solid Waste Management Act as amended.

BACKGROUND

The Facility is located within the French Broad River Basin at 701 DuPont Drive, Cedar Mountain, Transylvania County, North Carolina. DuPont began operations at the Facility in 1957. Originally, the Facility was used to produce silicon for use in transistors and other electronic devices. In 1962, the Facility switched to the production of medical imaging (X-ray) film. DuPont sold the Facility to Sterling Diagnostic Imaging Inc. (Sterling) in 1996. Sterling sold the Facility to AGFA Corp. in 1999. Sterling and AGFA continued X-ray manufacture at the Facility. AGFA discontinued manufacturing activities in December 2002 and sold the property back to DuPont in 2006. Prior to 2006, AGFA demolished the manufacturing plant and associated structures, closed and filled in the wastewater treatment impoundments, and regraded several areas of the site.

During its operational lifetime, Facility activities led to the creation of several areas where wastes were released or disposed. These areas are identified in the RCRA Permit as either Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs). Over the past several years DuPont has collected and analyzed soil, soil gas, surface water, stream sediment, and groundwater samples to determine the extent of any contamination associated with these SWMUs and AOCs. Hazardous constituents detected during these assessment activities include polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and inorganic compounds including metals.

DuPont excavated some of the materials disposed in two of the site SWMUs - SWMU 14 and SWMU 11 - and shipped these materials off for reclamation. In addition, hazardous constituents were removed from the site during excavation and closure of the wastewater treatment impoundments and during demolition and removal of the buildings and associated structures. These previous remedial actions

along with implementation of those Corrective Action activities proposed in the RAP will serve to protect human health and the environment as required under 40 CFR 264.101 as adopted in 15A NCAC 13A .0109 and in Conditions II.B. and II.I. of the RCRA Permit.

Corrective Action activities proposed in the RAP include:

- confirm known extent of contamination;
- long term operation and maintenance of caps and covers over contaminated SWMUs and AOCs;
- installation of protective fencing or cover material to prevent exposure to hazardous constituents that may be present in surface soil;
- solidification and capping of wastes in SWMU 17;
- excavation and reconfiguration of SWMU 11 cap and side slopes;
- monitoring of groundwater downgradient of SWMUs 11 and 17 to ensure remedial actions do not increase concentration of contaminants in groundwater;
- development and implementation of long term management plans to ensure all current and future users and receptors are protected from known or potential soil, groundwater, or soil gas contaminants; and,
- enforcement of land disturbance restrictions to prevent exposure to wastes that will remain on site.

The information and remedies proposed in the RAP meet the requirements in N.C.G.S. Article 9 – Part 8, 40 CFR 264.101 as adopted in 15A NCAC 13A .0109, and the RCRA Permit and will protect future users and receptors at the site.

Risk-Based Remediation under N.C.G.S. Article 9 – Part 8

N.C.G.S. Article 9 – Part 8 contains requirements for facilities to follow to demonstrate the Facility can be remediated to risk-based standards that will be protective of human health and the environment now and for any future uses. Part of the requirement to be eligible for Risk-Based Remediation is to determine the character and extent of contamination. DuPont has been conducting soil, soil gas, groundwater, surface water, and sediment sampling at the site for approximately 30 years. Data gathered during the numerous monitoring and sampling events was utilized in determining the Facility's eligibility for Risk-Based Remediation. In addition, the Facility submitted a Risk Assessment Report (RAR) to determine what, if any, additional activities would be required to ensure conditions at the Facility would be protective of human health and the environment. Review of historical data and the RAR indicated the Facility could apply for Risk-Based Remediation.

Once deemed eligible, DuPont notified DEQ, adjacent landowners, and local government agencies of its intent to pursue Risk-Based Remediation on May 26, 2016. As required, DuPont published notice of a public comment period that lasted from May 26, 2016 to July 26, 2016. During the time of the public comment period, a public meeting was held June 23, 2016 at the Transylvania County Public Library in Brevard. Comments received during the public comment period and during the public meeting were considered during RAP development.

A Draft RAP was submitted to the HWS on August 16, 2016. The HWS provided comments on this RAP on September 8, 2016. DuPont revised and resubmitted the Draft RAP on September 23, 2016. The HWS has reviewed the RAP and has determined it is complete. When fully implemented the RAP will meet the requirements in N.C.G.S. Article 9 – Part 8, 40 CFR 264.101 as adopted in 15A NCAC

13A .0109, and the RCRA Permit and will protect future users and receptors at the site.

Public Participation

The North Carolina Hazardous Waste Management Rules require that the public be given a forty-five (45) day period to comment on a proposed permit modification. This forty-five (45) day period will commence on October 21, 2016, and end on December 5, 2016. During this time, the public will have the opportunity to comment on the Class 3 permit modification and on the Draft RAP.

A Public Hearing will be held on December 1, 2016, at 6:00 p.m., in the Rogow Room, Transylvania County Public Library located at 212 South Gaston Street, Brevard, North Carolina. All attendees will have the opportunity to present five (5) minute oral statements regarding the proposed permit modification and the Draft RAP. Written comments may also be submitted at any time during the forty-five (45) day public comment period. Comments should be sent to the following address:

Julie S. Woosley, Hazardous Waste Section Chief
NC Division of Waste Management
Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646

All comments received during the public comment period or at the hearing will be considered in the decision approve the modification. Comments received after the public comment period ends will not be considered. The statutory authority for calling the hearing is G.S. 130A-294(f). Applicable State rules are found in the North Carolina Hazardous Waste Management Rules 15A NCAC 13A .0105, .0109, and .0113. These rules adopt the requirements of the Federal RCRA as amended by the HSWA of 1984.

Administrative Record

Information about the Facility is available in several locations on the internet including:

- A Public Notice about the RAP can be found on the NC Department of Environmental Quality's website at <http://deq.nc.gov/news/events/public-notice-hearings>;
- The administrative record for the Facility can be viewed electronically at the following link: <http://edocs.deq.nc.gov/WasteManagement/Search.aspx?cr=1>. To view a list of documents for the Facility, enter NCD003152329 (no spaces) in the ID Box and hit Search; and,
- A webpage with additional information is available at the following link: <https://deq.nc.gov/about/divisions/waste-management/hazardous-waste-section/dupont-facility-brevard-nc> .

Contact Person

Anyone needing additional information may contact Mark Wilkins at (919) 707-8207 or by email at mark.wilkins@ncdenr.gov .